

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

ALBERT L. GRAY, ADMINISTRATOR, et
al.,

Plaintiffs,

vs.

Case No. 04-CV-312

JEFFREY DERDERIAN, et al.,

Defendants.

**OPPOSITION TO PLAINTIFFS' MOTION FOR
PARTICULARIZED NEED DISCOVERY BY LEGGETT &
PLATT, INCORPORATED AND L&P FINANCIAL SERVICES CO.**

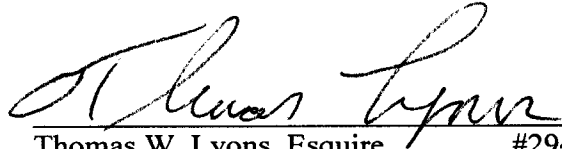
Leggett & Platt, Incorporated and L&P Financial Services provide the following opposition to Plaintiffs' Motion for Particularized Need Discovery. Plaintiffs seek production of certain foam in the possession of the State of Rhode Island and Town of West Warwick defendants purportedly taken from The Station Nightclub. Plaintiffs appear to request such foam be deposited into the Cranston evidence warehouse for later testing by Plaintiffs.

It is far too early in this complex litigation for the parties or the Court to determine how much of this foam should be preserved for use in this matter or to whom such foam should be allocated. For this reason and for the reasons set forth in the accompanying memorandum in support, Plaintiffs' motion is premature. Instead, L&P requests the Court order the State of Rhode Island and Town of West Warwick to preserve all foam in their possession until further critical information is known and informed decisions can be made regarding the nature and extent of any foam testing to be conducted.

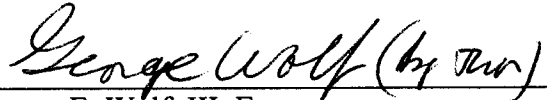
DEFENDANTS

LEGGETT & PLATT INCORPORATED and
L&P FINANCIAL SERVICES CO.

By their attorneys,



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CERTIFICATION

I hereby certify that on this 18th day of January, 2005, a copy of the within was sent to
all counsel of record by email.

